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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

GRAIL SEMICONDUCTOR, INC.,  
  
Plaintiff,

v.

RENESAS ELECTRONICS  
AMERICA INC.,

Defendant.

Case No. 11-cv-03847-JCS

**PROPOSED SCHEDULE**

Courtroom: G, 15<sup>th</sup> Floor, SF  
Judge: Honorable Joseph C. Spero

In accordance with the Court's Order of July 20, 2012 (Dkt. No. 95), Plaintiff Grail Semiconductor ("Grail") and Defendant Renesas Electronics America Inc. ("REA") respectfully submit the following Proposed Schedule.

Deadline	Event	
09/14/2012	Complete Rule 26(a)(1) initial disclosures	
10/26/2012	Serve "Disclosure of Asserted Claims and Infringement Contentions" (P.L.R. 3-1) Produce documents to accompany "Asserted Claims and Infringement Contentions" (P.L.R. 3-2)	
12/10/2012	Serve "Invalidity Contentions" (P.L.R. 3-3) Produce documents to accompany "Invalidity Contentions" (P.L.R. 3-4)	
TBD <sup>1</sup>	ADR Process: ENE	
12/21/2012	Exchange of proposed terms for construction (P.L.R. 4-1)	
01/25/2013	Exchange of Preliminary Claim Construction and Extrinsic Evidence (P.L.R. 4-2)	
02/22/2013	File Joint Claim Construction and Prehearing Statement (P.L.R. 4-3)	
03/22/2013	Complete claim construction discovery (P.L.R. 4-4)	
03/28/2013	Deadline to amend pleadings or add parties	For currently expected amendments, REA agrees to March 28, 2013. In the event information is disclosed after March 28, 2013, REA respectfully requests that Rule 15 of the Federal Rules of Civil Procedure govern potential amendments to the pleadings.
04/05/2013	Grail to file opening claim construction brief (P.L.R. 4-5(a))	

<sup>1</sup> Specific time for ADR process to be determined. Parties contemplate ADR process will occur sometime after the exchange of infringement and invalidity contentions.

Deadline	Event
04/19/2013	REA to file responsive claim construction brief (P.L.R. 4-5(b))
04/26/2013	Grail to file reply claim construction brief (P.L.R. 4-5(c))
<del>Subject to the Court's calendar</del>	Claim Construction Hearing (P.L.R. 4-6) - May 9, 2012 at 1:30 PM Tutorial for Claim Construction - May 6, 2013 at 1:30 PM
50 days from claim construction ruling	Advice of counsel defense discovery due (P.L.R. 3-7)
120 days from claim construction ruling	Close of fact discovery
150 days from claim construction ruling	Designation of expert witnesses and exchange of initial reports for party with burden of proof
190 days from claim construction ruling	Exchange of rebuttal expert reports
220 days from claim construction ruling	Close of expert discovery
250 days from claim construction ruling	Dispositive motions due
<i>At the Court's convenience</i>	Pretrial conference
<i>At the Court's convenience</i>	Trial

The parties have requested a jury trial for all issues so triable. Grail believes that the trial will require five (5) full court days. REA believes that the trial will require ten (10) full court days.

1 Dated: August 16, 2012

Respectfully submitted,

2 DAVIS WRIGHT TREMAINE LLP  
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3 NIRO, HALLER & NIRO  
4 Raymond P. Niro  
Christopher J. Lee  
5 Kara L. Szpondowski

6 By: /s/ Kara L. Szpondowski

7 ***Attorneys for Plaintiff***  
8 ***Grail Semiconductor, Inc.***

9 Dated: August 16, 2012

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15 By: /s/ Alissa R. Pohlman

16 ***Attorneys for Defendant Renesas Electronics***  
17 ***America Inc.***

18 *Concurrence in the filing of this document has*  
19 *been obtained from each of the other signatories*  
20 *pursuant to General Order 45(X)(B).*

21 Dated: 8/29/12

